



# State of New Jersey

Department of Environmental Protection

James E. McGreevey  
Governor

Bradley M. Campbell  
Commissioner

MAR 19 2003

Edward A. Hogan  
Norris McLaughlin & Marcus, PA  
P.O. Box 1018  
Somerville, NJ 08876-1018

Re: Hexcel Corporation (Hexcel)  
Lodi Borough, Bergen County  
ISRA Case #E86009  
Remedial Action Report dated: December 20, 2002

Dear Mr. Hogan:

Please be advised that the New Jersey Department of Environmental Protection (NJDEP) has completed its review of the above referenced Remedial Action Report. The NJDEP's responses regarding the Remedial Action Report are noted below:

## **I Sediment Requirements**

The proposed Sediment Sampling Program is acceptable with the following conditions.

1. The use of the methanol preservation technique should be specified for sediment volatile organic compound (VOC) sampling, pursuant to the Technical Requirements for Site Remediation N.J.A.C. 7:26E 2.1 (a)4.
2. As this portion of the Saddle River appears to be fairly straight/channelized with limited areas of sediment fines, substrate probing of channel and bank sediments with a coring device may aid in delineating depositional areas (in addition to the visual methods proposed on p. 6).
3. In addition to tabular presentation of data, the review will be facilitated if data that exceed criteria/standards are reported in "chem boxes" on a keyed, scaled map for all sample locations.
4. The work plan should specify standards and screening criteria to which data will be compared. Sediment data shall be compared to sediment screening criteria recommended in *NJDEP Guidance for Sediment Quality Evaluation, November 1998*, or other appropriate guidance with justification. Sediment screening criteria for a limited number of volatile organics are available in *Jones, et.al. Toxicological Benchmarks for Screening Contaminants of Potential Concern for Effects on Sediment-Associated Biota: 1997 Revision, Oak Ridge National Laboratory*.

## II Surface Water Requirements

The proposed Surface Water Sampling Program is acceptable with the following conditions.

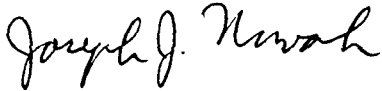
1. Surface-water samples shall be collected close to the bed of the river, rather than mid-depth in the water column, and shall be positioned toward the river bank in order to obtain samples from locations of anticipated minimum dilution.
2. Hexcel shall measure stream flow adjacent the site at the time of sampling, or shall extrapolate stream flow adjacent the site from the nearest, upstream USGS gauging station. In order to demonstrate to the NJDEP that stream flow was relatively low at the time of surface-water sampling, Hexcel shall indicate where the measured or estimated stream flow falls within the range of statistical stream flows for the Saddle River in the area of the site.
3. The NJDEP's approval of Hexcel's proposal to forego collection of ground water samples for priority pollutant metals (PPMs) and base neutral organic compounds (BNs) (other than 1,2-dichlorobenzene) is tentative at this time because Hexcel did not submit the sampling logs for the April 2002 ground-water sampling event, the results of which were reported in Hexcel's August 28, 2002 Progress Report. Hexcel shall submit the information required by the Technical Requirements for Site Remediation at N.J.A.C. 7:26-3.13(c)7 to the extent possible. The NJDEP may have additional comments regarding PPM and BN sampling of ground water and surface water based on a review of this information.
4. The work plan should specify standards and screening criteria to which data will be compared. Surface water data shall be compared with the more stringent of the New Jersey Surface Water Quality Standards or Federal Surface Water Quality Criteria. USEPA "Tier II" and other screening criteria are available for a limited number of volatile organics in *Suter and Tsao Toxicological Benchmarks for Screening Potential Contaminants of Concern for Effects on Aquatic Biota: 1996 Revision, Oak Ridge National Laboratory*

## III General Requirements

1. Hexcel shall submit the results of the sediment and surface water sampling within 90 calendar days of receipt of this letter.
2. Hexcel shall submit the report or additional proposals in triplicate. Please note that only one copy of the Quality Assurance/Quality Control Deliverables and one disk of electronic deliverables are needed.
3. Hexcel shall submit summarized analytical results in accordance with the Technical Requirements For Site Remediation (TRSR), N.J.A.C. 7:26E.
4. Hexcel shall collect and analyze all samples in accordance with the sampling protocol outlined in the May, 1992 edition of the NJDEP's "Field Sampling Procedures Manual" and the TRSR, N.J.A.C. 7:26E.
5. Hexcel shall notify the assigned BNCM Case Manager at least 14 calendar days prior to implementation of all field activities.

If you have any questions, please contact the Case Manager, Joseph J. Nowak, at (609) 292-0130.

Prepared By:



Joseph J. Nowak, Case Manager  
Bureau of Northern Case Management

Approved By:



Maurice Migliarino, Section Chief,  
Bureau of Northern Management

c: Kris Geller, BEERA  
Beverly Phillips, BGWPA  
A. William Nosil, Hexcel Corporation  
Joseph Savarese, Haley & Aldrich

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